

### **REMARKS/ARGUMENTS**

These remarks are submitted in response to the Office Action of March 10, 2006 (Office Action). This response is filed within the 3-month shortened statutory period, and as such, no fee is believed due; however, the Commissioner is hereby authorized to charge any underpayment to Deposit Account No. 50-0951.

Claims 1-13 were rejected on the basis of new grounds of rejection, as noted at page 7 of the Office Action. In the Office Action, each of the claims was rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,956,845 to Baker, *et al.* (Baker).

Applicants have amended independent Claims 1, 10, and 12 to further emphasize certain aspects of the invention. The amendments also correct the minor informalities noted at page 2 of the Office Action regarding Claims 10 and 12. The claim amendments, as discussed herein, are fully supported throughout the Specification. (See, e.g., Specification, p. 5, lines 11-27; p. 6, lines 1-11; and p. 11, line 12 – p. 12, line 28; see also FIG. 7.) No new matter has been introduced by the claim amendments.

### **Applicants' Invention**

It may be useful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, typified by amended independent Claim 1, is a visual tool for creating an extended Java applications programming interface for integrated networks (JAIN) compliant telecommunication service component for use in a service logic execution environment (SLEE).

The visual tool can include a first visual smartguide for creating JAIN-compliant service building blocks configured to receive and transmit telecommunication events to and from at least one JAIN configured protocol stack through a JAIN-compliant signaling layer. Each of the JAIN-compliant service building blocks, moreover, can comprise meta-information for identifying the service building block and a pre-defined list of different event handlers for handling specific telecommunication events received from an event routing bus

in the SLEE, wherein the SLEE is configured to be compatible with a JAVA API for Integrated Networks (JAIN) specification for communicating with the JAIN-compliant service building blocks. (See, e.g., Specification, p. 12, lines 6-9.)

The visual tool also can include a second visual JAIN-compliant smartguide for creating deployment descriptors for the created JAIN-compliant service building blocks. Each deployment descriptor can comprise a service description describing parameters for loading an instance of a JAIN-compliant service building block in the SLEE, an encapsulation of the meta-information corresponding to a particular one of the service building blocks, and a list of supported telecommunication events that can be handled in the SLEE by an associated JAIN-compliant service building block. (See, e.g., Specification, p. 12, lines 14-19.)

The visual tool further can include a visual composition interface that includes a visual display within which visual iconic representations of the JAIN-compliant service building blocks can be arranged in combination with one another so as to form an extended JAIN-compliant telecommunication service component. (See, e.g., Specification, p. 12, lines 20-23.) The arrangement, more particularly, can be effected by a user's performing drag-and-drop operations to move the visual iconic representations into a designated work space of the visual display and connecting the visual iconic representations with visually displayed connectors. (See, e.g., p. 12, lines 24-28.) Additionally, in response to the drag-and-drop operations and the connecting performed in the designated work space, the extended JAIN-compliant telecommunication service component can automatically configure itself using a deployment descriptor upon identifying underlying resources that are available when the JAIN-compliant telecommunication service component is unaware of underlying JAIN protocol resources within the SLEE.

**The Claims Define Over The Prior Art**

As noted above, Claims 1-13 were rejected under 35 U.S.C. § 102(e) as being anticipated by Baker. Baker is directed to a Web-based call routing management application with which the authorized customers of a service provider can customize call routing rules and generate associated reports. (See, Col. 2, lines 60 – Col. 3, line 6; see also Col. 5, lines 24-31, and Abstract.)

It is stated in the Office Action with respect to independent Claims 1, 10, and 12 that Baker teaches a visual tool that includes a first visual smartguide, as expressly recited in the Claim 1, and that Baker further teaches a method of generating a service component as recited in Claims 10 and 12. In the first of two portions cited in the Office Action regarding these features, Baker provides the following:

"The present invention is directed to a call routing management application, including a routing management workstation, referred to herein as a call manager webstation (CMWS), which allows authorized customers to control toll free routing and monitor call center statuses. The terms call manager and call manager webstation will be used herein after and will refer to a system providing a call routing management capabilities. Via a web-based interface, customers may create and manage routing rules which may be applied on an individual call basis, monitor one or more call center automatic call distributor (ACD) agent groups, and view alarms. The present invention also provides reporting, data extract, and bulk data loading capabilities via a web-based interface.

"The application features provided by the present invention include rules writing, testing and installation in which users are enabled to write rules for routing of toll free calls. Rules may load balance based on the call center

capacity and route based on a calling number, caller-entered digits, or call termination quotas." (Col. 2, line 60 – Col. 3, line 12.)

Elsewhere, in a second portion cited in the Office Action, Baker provides:

"For providing the [described] functionalities, the present invention includes front-end client browser software including a web browser, HTML files including files within which scripts written in JavaScript client scripting language are embedded, and Java application and applet codes, which are executed on the customer's desktop system, i.e., a workstation. The Java classes providing the user interface include user and business hierarchy, call by call application, graphic data display, alarm manager, and reporting/data extraction, each of which provides a corresponding application feature supported by the present invention. The above client browser software physically resides on a web server and is downloaded dynamically to the customer's system via their web browser and an Internet connection." (Col. 3, lines 37-50.)

It is stated at page 3 of the Office Action that these portions describe the manner in which, with Baker, a "user defines events for routing calls using a Java compatible GUI [graphical user interface]." As the quoted language demonstrates, Baker's focus is on providing a Web-based system for writing call routing rules. Baker's writing of user-defined rules to route calls, however, fails to disclose the creation of *different* service building blocks which can be combined to form a telecommunication service component, as recited in Claims 1, 10, and 12. Baker is instead directed to one type of event – that of call routing – not different events, such as call blocking as well as call forwarding that are accomplished by combining different service building blocks to create a service component. (See, e.g.,

Specification, p. 12, lines 4-6.) Not surprisingly, therefore, Baker further fails to disclose that each different service building block comprises meta-information for identifying a particular service building block and corresponding to different ones of a plurality of different events. This feature is not needed in Baker, since Baker is concerned with the single event of call routing, not a plurality of different events. Moreover, Baker nowhere describes any use of meta-information, let alone meta-information for identifying specific service building blocks, as further recited in amended Claims 1, 10, and 12.

Baker also fails to teach, either expressly or inherently, a visual composition interface having the different aspects recited in independent Claim 1, as amended, or a method of visually arranging a combination of service building blocks, as recited in amended independent Claims 10 and 12. In the first of two portions cited in the Office Action regarding these features, Baker states:

"The call manager system or the present invention provides sophisticated mechanisms, e.g., intelligent call routing, for all center customers to control delivery of toll free calls from the telecommunications enterprise network to call centers, including call centers having multiple ACDs. Particularly, using the system of the present invention, the customers have the ability to define routing rules which, on an individual call basis, determine the best place to route incoming toll free calls. A high level overview of the call manager system environment is illustrated in FIG. 6. The call manager system generally includes: a service control point (SCP) 610, for providing call manager routing features, known as "call by call" routing; an intelligent routing host (IR host) 612; and client workstations, i.e., call manager webstation client 360. The COP 610 is a routing engine which essentially maintains call routing rules and uses those rules to determine where to route the calls. The SCP 610 shown and described hereinafter, is used as an example of a system implementing the

routing engine. It should be noted that the routing engine implementation is not limited to and need not reside in a mainframe system. Rather, the routing engine may also be supported by various types of processors having a wide range of processing capability." (Col. 12, lines 20-42.) (Emphasis Supplied.)

In another portion cited in the Office Action, Baker provides:

The network architecture of FIG. 2 may also include a variety of application specific proxies having associated Intranet application servers including: a StarOE proxy for the StarOE application server 39 for handling authentication order entry/billing; an Inbox proxy for the Inbox application server 31, which functions as a container for completed reports, call detail data and marketing news messages; a Report Manager proxy capable of communicating with a system-specific Report Manger server 32 for generation, management and receipt notification of customized reports; a Report Scheduler proxy for performing the scheduling and requests of the customized reports. The customized reports include, for example: call usage analysis information provided from the StarODS server 33; network traffic analysis/monitor information provided from the Traffic view server 34; virtual data network alarms and performance reports provided by Broadband server 35; trouble tickets for switching, transmission and traffic faults provided by Service Inquiry server 36; and toll free routing information provided by Toll Free Network Manager server 37. (Col. 9, line 58 – Col. 10, line 12.) (Emphasis Supplied.)

The quoted language in both cited portions explicitly reveals that FIG. 2 and FIG. 6 in Baker pertain to high-level "architectures" of an underlying system. Neither of the figures

relate to graphical user interfaces of any kind. More fundamentally, the figures and the related descriptive portions of Baker notably fail to teach or suggest any of the features of a visual composition interface, as recited in amended independent Claim 1, or the steps for creating a telecommunication service component by visually arranging iconic representations of different service building blocks using visual connectors as recited in amended independent Claims 10 and 12.

Moreover, none of the figures or descriptive portions of Baker disclose, either expressly or inherently, a visual display within which visual icons representing different JAIN-compliant service building blocks are presented. It follows, accordingly, that Baker can not be read as disclosing the visual presentation of iconic representations that are selectively arranged in workspace into a combination that forms an extended JAIN-compliant telecommunication service component, as recited in amended Claims 1, 10, and 12. Nowhere, in fact, does Baker disclose or even allude to the performing of drag-and-drop operations so as to move iconic representations into a designated workspace of a visual display. No portion of Baker can be read as even inherently teaching the connecting of different iconic representations of different service building blocks so displayed using visual connectors that connect up the different iconic representations.

If further follows, therefore, that Baker similarly fails to expressly or inherently teach that, in response to the drag-and-drop operations and connecting performed in a designated work space, that extended a JAIN-compliant telecommunication service component automatically configures itself using a deployment descriptor. Nor does Baker teach that the automatic configuration follows the identifying of underlying resources that are available when the JAIN-compliant telecommunication service component is unaware of the underlying JAIN protocol resources within a service logic execution environment (SLEE).

Accordingly, Baker fails to teach, either expressly or inherently, every feature recited in independent Claims 1, 10, and 12, as amended. Applicants respectfully submit, therefore, that Claims 1, 10, and 12 define over the prior art. Applicants further respectfully submit

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Amendment dated June 12, 2006  
Reply to Office Action of March 10, 2006  
Docket No. BOC9-2000-0099 (223)

that whereas each of the remaining claims depends from one of the amended independent claims while reciting further features, these claims likewise define over the prior art.

### CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,

Date: June 12, 2006



Gregory A. Nelson, Registration No. 30,577

Richard A. Hinson, Registration No. 47,652

Marc A. Boillot, Registration No. 56,164

AKERMAN SENTERFITT

Customer No. 40987

Post Office Box 3188

West Palm Beach, FL 33402-3188

Telephone: (561) 653-5000